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Attorneys for Defendant
EXPERIAN HOLDINGS, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

COLIN RYAN AND CAITLAN
LANGE, on behalf of themselves and
all others similarly situated,

Plaintiffs,

V.

**EXPERIAN HOLDINGS, INC. and
EXPERIAN INFORMATION
SOLUTIONS, INC.**

Defendants

Case No. 8:15-cv-01595 JVS (DFMx)
Hon. James V. Selna

**STIPULATION TO EXTEND
TIME TO RESPOND TO
AMENDED COMPLAINT**

1 Pursuant to Local Rule 8-3, Plaintiffs Collin Ryan and Caitlan Lange, and
 2 Defendants Experian Holdings Inc. and Experian Information Solutions, Inc.
 3 (collectively, the “Parties”) hereby stipulate that Defendants shall have an
 4 additional 30 days, up to and including December 4, 2015, to respond to Plaintiffs’
 5 Amended Complaint. Defendant was served with Plaintiffs’ initial Complaint on
 6 October 14, 2015. Plaintiffs voluntarily amended their complaint on October 16,
 7 2015, and Defendants’ current response date to the Amended Complaint is
 8 November 4, 2015. The Parties stipulate that Defendants’ new response date to the
 9 Amended Complaint is December 4, 2015.

10 The parties have agreed to this stipulation in the spirit of cooperation and for
 11 good cause given the complexity of the issues raised in Plaintiffs’ complaint, which
 12 requires a thorough investigation by Defendants of Plaintiffs’ claims and allegations,
 13 prior to Defendants filing their response. Pursuant to the Court’s Procedures and
 14 Schedules, the Parties are submitting a proposed order with this stipulation, and the
 15 proposed order includes the Parties’ proposed dates.

16 Pursuant to Local Rule 5-4.3.4, Richard J. Grabowski hereby attests that the
 17 following signatories concur in the filing’s content and have authorized the filing.

18 Dated: October 20, 2015

JONES DAY

19

By: /s/ Richard J. Grabowski
 20 Richard J. Grabowski

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Counsel for Defendants
 22 EXPERIAN HOLDINGS, INC. AND
 INFORMATION SOLUTIONS, INC.

23

Dated: October 20, 2015

ROBINSON CALCAGNIE
 24 ROBINSON SHAPIRO DAVIS INC.

25

By: /s/ Mark P. Robinson, Jr.
 26 Mark P. Robinson Jr.

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Counsel for Plaintiffs
 28 COLIN RYAN AND CAITLAN
 LANGE